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California Civil Rights Department*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**HINDU AMERICAN FOUNDATION, INC.,  
a Florida Not-For-Profit Corporation;  
SAMIR KALRA; MIHIR MEGHANI;  
SANGEETHA SHANKAR; DILIP AMIN,  
SUNDAR IYER, RAMANA KOMPELLA  
as individuals; and DOE PLAINTIFFS ONE  
TO THREE,**

Plaintiffs,

**v.**

**KEVIN KISH, an individual, in his official  
capacity as Director of the California Civil  
Rights Department; and Does 1-50,  
inclusive,**

Defendants.

Case No. 2:22-CV-01656-DAD-JDP

**UNOPPOSED APPLICATION FOR  
EXTENSION OF TIME TO RESPOND  
TO FIRST AMENDED COMPLAINT**

Complaint filed: September 20, 2022

Judge: Hon. Dale A. Drozd

1 Defendant Kevin Kish, in his official capacity as the Director of the California Civil Rights  
2 Department, hereby requests a 45-day extension of time to respond to Plaintiffs' First Amended  
3 Complaint (ECF No. 21), which was filed on September 21, 2023, pursuant to Federal Rule of  
4 Civil Procedure Rule 6 and Local Rule 144. Defendant Kish's response to Plaintiffs' First  
5 Amended Complaint is currently due by Thursday, October 5, 2023. (Fed. R. Civ. P. 15(a)(3)).

6 There is good cause for the requested extension. First, an extension of time is necessary to  
7 allow Defendant Kish sufficient time to evaluate Plaintiffs' First Amended Complaint.  
8 (Declaration of Carly J. Munson in Support of Application for Extension of Time to Respond  
9 ("Munson Decl.") ¶¶ 3-7). The First Amended Complaint includes two new claims and nine new  
10 plaintiffs (*see* ECF No. 21), including three "Doe" plaintiffs whose identities have not been  
11 disclosed to Defendant Kish or his counsel. (Munson Decl. ¶ 3). Further, Defendant Kish  
12 anticipates filing one or more motions in response to the First Amended Complaint, and the  
13 parties will require ample time to meet and confer prior to such filings. (*Id.* ¶ 4).

14 Second, Defendant's counsel have pre-existing filing deadlines that warrant the requested  
15 extension. Defendant's counsel have several significant filings in other matters, including  
16 dispositive motions and an appellate brief, which are due in October 2023 in accordance  
17 previously ordered briefing schedules. (*Id.* ¶ 5). Further, Defendant's lead counsel in this matter  
18 was out of the office from September 21 to 27 due to pre-existing plans and unable to address  
19 Plaintiffs' First Amended Complaint during that time. (*Id.* ¶ 6).

20 Finally, Defendant Kish has not sought or been granted any prior extensions of time to  
21 respond to Plaintiffs' First Amended Complaint. (*Id.* ¶ 8). Moreover, Plaintiffs do not oppose to  
22 the requested extension of time (*id.* ¶ 7), and thus will not be prejudiced by it.

23 Based on the aforementioned cause, Defendant Kish respectfully requests that the Court  
24 grant him a 45-day extension of time—until Monday, November 20, 2023—to respond.

Dated: September 29, 2023

Respectfully submitted,

ROB BONTA  
Attorney General of California  
WILLIAM H. DOWNER  
Supervising Deputy Attorney General

/s/ Carly J. Munson  
CARLY J. MUNSON  
Deputy Attorney General  
*Attorneys for Defendant Kevin Kish, in his  
official capacity as Director of the California  
Civil Rights Department*